

# **EXHIBIT B**

1 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
A Limited Liability partnership  
2 Including Professional Corporations  
GARY L. HALLING, Cal. Bar No. 66087  
3 JAMES L. MCGINNIS, Cal. Bar No. 95788  
MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524  
4 Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111-4109  
5 Telephone: (415) 434-9100  
Facsimile: (415) 434-3947  
6 E-mail: ghalling@sheppardmullin.com  
jmccinnis@sheppardmullin.com  
7 mscarborough@sheppardmullin.com

8 Attorneys for Defendants  
SAMSUNG SDI AMERICA, INC.,  
9 SAMSUNG SDI CO., LTD.,  
SAMSUNG SDI (MALAYSIA) SDN. BHD.,  
10 SAMSUNG SDI MEXICO S.A. DE C.V.,  
SAMSUNG SDI BRASIL LTDA.,  
11 SHENZEN SAMSUNG SDI CO., LTD. and  
TIANJIN SAMSUNG SDI CO., LTD.  
12

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
16

17  
18 In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION  
19

Case No. 07-5944 SC

MDL No. 1917

**SAMSUNG SDI AMERICA, INC.'S  
FIRST SET OF INTERROGATORIES  
TO INDIRECT PURCHASER  
PLAINTIFFS**

20  
21 This Document Relates to:  
22 INDIRECT PURCHASER ACTIONS  
23

24 PROPOUNDING PARTY: SAMSUNG SDI AMERICA, INC.  
25 RESPONDING PARTY: INDIRECT PURCHASER PLAINTIFFS  
26 SET NO.: ONE (1-5)  
27  
28

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure,  
2 Defendant Samsung SDI America, Inc. hereby requests that the Indirect Purchaser  
3 Plaintiffs in the above-captioned action ("Plaintiffs") serve their verified responses to the  
4 following first set of interrogatories (the "Interrogatories") on James L. McGinnis of  
5 Sheppard Mullin Richter & Hampton LLP within thirty (30) days after the date of the  
6 service hereof.

7 I.

8 **DEFINITIONS AND INSTRUCTIONS**

9 1. "YOU" and "YOUR" means the Indirect Purchaser Plaintiffs in the above-  
10 entitled action, their direct and indirect parents, predecessors in interest, affiliates,  
11 subsidiaries, divisions, predecessors, successors, and assigns, the present and former  
12 officers, directors, employees, attorneys, agents, and representatives of any of the above,  
13 and each person acting or purporting to act on their behalf.

14 2. "COMPLAINT" means the Consolidated Amended Complaint filed by YOU  
15 in the above-entitled action on March 16, 2009.

16 3. "CRTs" means cathode ray tubes, as defined in Paragraph 13 of the  
17 COMPLAINT.

18 4. "DEFENDANTS" means the entities enumerated in Paragraphs 50-108 of  
19 the COMPLAINT.

20 5. "DOCUMENTS" is used in the broadest possible sense as interpreted under  
21 the Federal Rules of Civil Procedure and shall include, without limitation, any kind of  
22 written, typewritten, or printed material whatsoever, and any computer hard drive or  
23 computer readable media, including, without limitation, papers, agreements, contracts,  
24 notes, memoranda, presentations, presentation materials, COMMUNICATIONS, letters,  
25 telegrams, messages sent to or received from a wireless device, electronic mail, statements,  
26 invoices, personal diaries, records, books, maps, blueprints, forms, transcriptions, CDs,  
27 DVDs, floppy discs, magnetic tapes, recordings, translations to any language, printed  
28

1 cards, programming instructions, assembly diagrams, schematic diagrams, and manuals  
2 either in YOUR possession or custody or under YOUR control, and shall include, without  
3 limitation, originals, file copies, and other copies, no matter how or by whom prepared,  
4 and all drafts prepared in connection with any such writings, whether used or not,  
5 regardless of whether the DOCUMENT still exists, and regardless of who has maintained  
6 custody of such DOCUMENTS.

7 6. "PERSON" means any individual or group of individuals, corporation,  
8 partnership, association, governmental entity, department, commission, bureau or any  
9 other kind of legal or business entity.

10 7. When referring to a PERSON, "IDENTITY" or "IDENTIFY" means, to the  
11 extent known, the person's full name, present or last known address, and when referring to  
12 a natural person, additionally, the present or last known place of employment. Once a  
13 person has been identified in accordance with this subparagraph, only the name of the  
14 person need be listed in response to subsequent discovery requesting the identification of  
15 that person.

16 8. When referring to a DOCUMENT, "IDENTITY" or "IDENTIFY" means, to  
17 the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the  
18 document; and (iv) author(s), addressee(s) and recipient(s).

19 9. The words "and" and "or" shall be construed in the conjunctive or  
20 disjunctive, whichever makes the requests more inclusive.

21 10. All nouns in the singular or plural shall be construed in the singular or plural,  
22 whichever makes the requests more inclusive.

23 11. The use of the past tense of any verb shall include the present tense and vice  
24 versa.

25 12. The word "any" shall be construed to include "all" and vice versa.

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II.

**INTERROGATORIES**

**Interrogatory No. 1:**

State with specificity the factual basis (including the IDENTITY of each DOCUMENT, PERSON or other evidentiary source upon which YOU rely) for YOUR allegation that DEFENDANTS "conspired to fix, raise, maintain and/or stabilize prices" of monitors containing CRTs, as alleged in, *inter alia*, Paragraphs 1 and 15 of the COMPLAINT.

**Interrogatory No. 2:**

State with specificity the factual basis (including the IDENTITY of each DOCUMENT, PERSON, or other evidentiary source upon which YOU rely) for YOUR allegation that DEFENDANTS intended to and did "pass on the full cost" of CRTs in their sales of monitors containing CRTs, as alleged in, *inter alia*, Paragraph 238 of the COMPLAINT.

**Interrogatory No. 3:**

For each separate DEFENDANT (regardless of its affiliation with any other DEFENDANT) state with specificity the factual basis (including the IDENTITY of each DOCUMENT, PERSON, or other evidentiary source upon which YOU rely) for YOUR allegation that it "conspired to fix, raise, maintain, and/or stabilize prices" at which products containing CRTs were sold in the United States, as alleged in, *inter alia*, Paragraph 1 of the COMPLAINT.

**Interrogatory No. 4:**

For each separate DEFENDANT (regardless of its affiliation with any other DEFENDANT) state with specificity the factual basis (including the IDENTITY of each

1 DOCUMENT, PERSON, or other evidentiary source upon which YOU rely) for YOUR  
2 allegation that it agreed to allocate market shares and customers of sales of products  
3 containing CRTs, as alleged in, *inter alia*, Paragraphs 156(i) and 156(j) of the  
4 COMPLAINT.

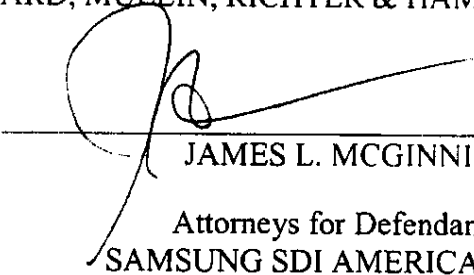
5 **Interrogatory No. 5:**

6  
7 IDENTIFY each PERSON who provided information to answer these  
8 Interrogatories.

9  
10  
11 DATED: March 8, 2010

12 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

13  
14 By

  
15 JAMES L. MCGINNIS

16 Attorneys for Defendants  
17 SAMSUNG SDI AMERICA, INC.,  
18 SAMSUNG SDI CO., LTD.,  
19 SAMSUNG SDI (MALAYSIA) SDN. BHD.,  
20 SAMSUNG SDI MEXICO S.A. DE C.V.,  
21 SAMSUNG SDI BRASIL LTDA.,  
22 SHENZEN SAMSUNG SDI CO., LTD. and  
23 TIANJIN SAMSUNG SDI CO., LTD.  
24  
25  
26  
27  
28

1 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
A Limited Liability partnership  
2 Including Professional Corporations  
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MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524  
4 Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111-4109  
5 Telephone: (415) 434-9100  
Facsimile: (415) 434-3947  
6 E-mail: ghalling@sheppardmullin.com  
jmcginnis@sheppardmullin.com  
7 mscarborough@sheppardmullin.com

8 Attorneys for Defendants  
SAMSUNG SDI AMERICA, INC.,  
9 SAMSUNG SDI CO., LTD.,  
SAMSUNG SDI (MALAYSIA) SDN. BHD.,  
10 SAMSUNG SDI MEXICO S.A. DE C.V.,  
SAMSUNG SDI BRASIL LTDA.,  
11 SHENZEN SAMSUNG SDI CO., LTD. and  
TIANJIN SAMSUNG SDI CO., LTD.  
12

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
16

17 In re: CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

19  
20 This Document Relates to:  
21  
22 INDIRECT PURCHASER ACTIONS  
23

**SAMSUNG SDI AMERICA, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
INDIRECT PURCHASER  
PLAINTIFFS**

24 PROPOUNDING PARTY: SAMSUNG SDI AMERICA, INC.  
25 RESPONDING PARTY: INDIRECT PURCHASER PLAINTIFFS  
26 SET NO.: ONE (1-4)  
27  
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Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Samsung SDI America, Inc. hereby requests that the Indirect Purchaser Plaintiffs in the above-captioned action ("Plaintiffs") produce for inspection and copying each of the documents and other things described below at the offices of Sheppard Mullin Richter & Hampton LLP, 4 Embarcadero Center, 17<sup>th</sup> Floor, San Francisco, CA 94111 within thirty (30) days after the date of the service hereof.

# I.

## DEFINITIONS AND INSTRUCTIONS

1. "YOU" and "YOUR" means the Indirect Purchaser Plaintiffs in the above-entitled action, their direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assigns, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on their behalf.

2. "DOCUMENTS" is used in the broadest possible sense as interpreted under the Federal Rules of Civil Procedure and shall include, without limitation, any kind of written, typewritten, or printed material whatsoever, and any computer hard drive or computer readable media, including, without limitation, papers, agreements, contracts, notes, memoranda, presentations, presentation materials, COMMUNICATIONS, letters, telegrams, messages sent to or received from a wireless device, electronic mail, statements, invoices, personal diaries, records, books, maps, blueprints, forms, transcriptions, CDs, DVDs, floppy discs, magnetic tapes, recordings, translations to any language, printed cards, programming instructions, assembly diagrams, schematic diagrams, and manuals either in YOUR possession or custody or under YOUR control, and shall include, without limitation, originals, file copies, and other copies, no matter how or by whom prepared, and all drafts prepared in connection with any such writings, whether used or not, regardless of whether the DOCUMENT still exists, and regardless of who has maintained custody of such DOCUMENTS.



1           3.     "Interrogatory" refers to the interrogatories enumerated in Samsung SDI  
2 America, Inc.'s First Set of Interrogatories to Indirect Purchaser Plaintiffs.

3           4.     YOU are required to produce all documents in the manner, form and position  
4 in which they are kept in the ordinary course of business, as required by the Federal Rules  
5 of Civil Procedure, including, where applicable, any index tabs, file dividers, designations,  
6 or other information as to the location of the documents.

7           5.     If YOU cannot respond to a request for production fully, after a diligent  
8 attempt to obtain the requested information, YOU must answer the request to the extent  
9 possible, specify the portion of the request YOU are unable to answer, and provide  
10 whatever information YOU have regarding the answered portion.

11          6.     In the event that any requested document has been destroyed, lost, discarded  
12 or is otherwise no longer in YOUR possession, custody, or control, YOU shall identify the  
13 document as completely as possible and specify the document's disposal date, disposal  
14 manner, disposal reason, the person who authorized the disposal, and the person who  
15 disposed of the document.

16          7.     In the event any information is withheld on a claim of attorney-client-  
17 privilege, work-product doctrine, or any other applicable privilege, YOU shall provide a  
18 privilege log that includes at least the following information: the nature of the information  
19 contained in the withheld document, the document date, source, and subject matter, the  
20 author(s) and recipient(s), such as would enable the privilege claim to be adjudicated, and  
21 any authority that YOU asserts supports any claim of privilege.

22          8.     The word "any" shall be construed to include "all" and vice versa.

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II.

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**Request for Production of Documents No. 1:**

All DOCUMENTS that support YOUR response to Interrogatory No. 1.

**Request for Production of Documents No. 2:**

All DOCUMENTS that support YOUR response to Interrogatory No. 2.

**Request for Production of Documents No. 3:**

All DOCUMENTS that support YOUR response to Interrogatory No. 3.

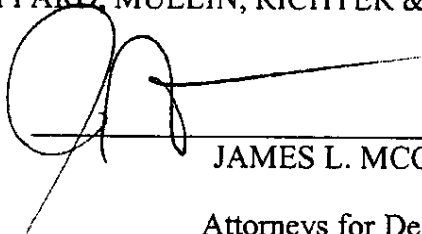
**Request for Production of Documents No. 4:**

All DOCUMENTS that support YOUR response to Interrogatory No. 4.

DATED: March 8, 2010

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By

  
JAMES L. MCGINNIS

Attorneys for Defendants  
SAMSUNG SDI AMERICA, INC.,  
SAMSUNG SDI CO., LTD.,  
SAMSUNG SDI (MALAYSIA) SDN. BHD.,  
SAMSUNG SDI MEXICO S.A. DE C.V.,  
SAMSUNG SDI BRASIL LTDA.,  
SHENZHEN SAMSUNG SDI CO., LTD. and  
TIANJIN SAMSUNG SDI CO., LTD.

MICHAEL TUBACH (SBN 145955)  
O'MELVENY & MYERS LLP  
Two Embarcadero Center, 28th Floor  
San Francisco, California 94111  
Telephone: (415) 984-8700  
Facsimile: (415) 984-8701  
Email: mtubach@omm.com

IAN SIMMONS (*Admitted Pro Hac Vice*)  
O'MELVENY & MYERS LLP  
1625 Eye St. NW  
Washington, D.C. 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414  
Email: isimmons@omm.com

Attorneys for Defendant:  
**SAMSUNG ELECTRONICS AMERICA, INC.**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE CATHODE RAY TUBE (CRT)	)	No. 07-5944-SC
ANTITRUST LITIGATION	)	MDL No. 1917
	)	
	)	Judge: Hon. Samuel Conti
This Document Relates to:	)	Special Master: Hon. Charles A. Legge (Ret.)
	)	
INDIRECT PURCHASER ACTION	)	<b>FIRST SET OF INTERROGATORIES</b>
	)	<b>OF SAMSUNG ELECTRONICS</b>
	)	<b>AMERICA, INC. TO THE INDIRECT</b>
	)	<b>PURCHASER PLAINTIFFS</b>
	)	
	)	
	)	
	)	

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Samsung Electronics America, Inc. hereby requests that the Indirect Purchaser Plaintiffs ("Plaintiffs") in the above-captioned action respond to the following first set of interrogatories (the "Interrogatories"). Plaintiffs are directed to serve their verified answers in conformance with the above-cited rules at the offices of O'MELVENY & MYERS LLP, Attn: Ian Simmons, 1625

1 Eye Street NW, Washington, D.C. 20006 (or at such other place as may be agreed upon by the  
2 parties), within thirty (30) days after the date of the service hereof.

3 **DEFINITIONS**

4 For the purposes of these Interrogatories, the following definitions apply:

5 A. "Action" means the above-captioned consolidated class action.

6 B. "And" and "or" shall be construed either disjunctively or conjunctively as  
7 necessary to bring within the scope of the Interrogatories all information that might otherwise be  
8 construed to be outside of their scope.

9 C. "Complaint" means Plaintiffs' Consolidated Amended Complaint in the Action,  
10 filed in the United States District Court for the Northern District of California on March 16, 2009.

11 D. "CRTs" means cathode ray tubes, as defined in Paragraphs 13 and 14 of the  
12 Complaint.

13 E. "CRT Products" means "products containing CRTs, such as television sets and  
14 computer monitors" as defined in Paragraph 15(b) of the Complaint.

15 F. "Defendants" means all entities enumerated in paragraphs 50-108 of the  
16 Complaint.

17 G. "Document(s)" means "documents" as defined in the Federal Rules of Civil  
18 Procedure including but not limited to any written, printed, typed, recorded, filmed, punched,  
19 transcribed, taped or other graphic matter of any kind or nature, however produced or reproduced,  
20 whether in hard copy, electronic, or other form, and includes, without limitation, pamphlets,  
21 brochures, books, booklets, information sheets, papers, articles, journals, magazines, computer  
22 printouts, Internet search results, tapes, discs or other forms of audio, visual or audio/visual  
23 recordings, records, memoranda, reports, financial statements, affidavits, handwritten and other  
24 notes, transcripts, paper, indices, letters, envelopes, telegrams, cables, electronic mail messages,  
25 telex messages, telecopied messages, telephone messages, summaries or records of telephone  
26 conversations, summaries or records of personal conversations or interviews, summaries or  
27 records of meetings or conferences, minutes or transcriptions or notations of meetings or  
28 telephone conversations or other communications of any type, tabulations, studies, analyses,

1 evaluations, projections, work papers, statements, summaries, opinions, journals, desk calendars,  
2 product labels, maintenance or service records, appointment books, diaries, billing records,  
3 checks, bank account statements, invoices.

4 H. "Each" means all, each, and every.

5 I. "Person(s)" means and includes all natural persons or entities, governmental units,  
6 partnerships, firms, corporations, associations, joint ventures, any other form of business  
7 organization or arrangement, or any form of public, private or legal entity.

8 J. "You" and "Your" means the Indirect Purchaser Plaintiffs in the Action, their  
9 direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions,  
10 predecessors, successors, and assigns, the present and former officers, directors, employees,  
11 attorneys, agents, and representatives of any of the above, and each person acting or purporting to  
12 act on their behalf.

13 K. The singular form of any noun or pronoun includes the plural, and vice versa.

14 L. Terms in the present tense include terms in the past tense, and terms in the past  
15 tense include terms in the present tense.

16 **GENERAL INSTRUCTIONS**

17 1. Answers to these Interrogatories are to be based upon all knowledge or  
18 information available to Plaintiffs, including, but not limited to, all information or knowledge  
19 derivable from business or other records, and all knowledge or information possessed by any  
20 person, including but not limited to any employee, agent, attorney, expert witness, consultant,  
21 representative or other advisor, subject to the instruction, direction or control of Plaintiffs.

22 2. Each Interrogatory is to be answered separately and in order, and shall be  
23 construed independently and not by reference to any other Interrogatory.

24 3. Plaintiffs should answer each Interrogatory fully, unless it is objected to, in which  
25 event the reasons for the objection should be specifically and separately stated.

26 4. The answers are to be signed by Plaintiffs and the objections, if any, are to be  
27 signed by the attorney making them.

28

5. Where a complete answer to a particular Interrogatory is not possible, the Interrogatory should be answered to the extent possible and a statement should be made indicating why only a partial answer is given, together with the identity of each Document or source from which more complete information is obtainable.

6. With respect to any Interrogatory that Plaintiffs may allege that they are unable to answer due to insufficient knowledge, Plaintiffs are requested to specify the nature of the inquiries made in an attempt to enable Plaintiffs to answer the Interrogatory, including the identity of any person communicated with in an attempt to enable Plaintiffs to respond fully to the Interrogatory.

7. If, in answering these Interrogatories, Plaintiffs claim any ambiguity in interpreting either a particular Interrogatory or a definition or instruction, such claim shall not be utilized as a basis for refusing to answer. Instead, Plaintiffs shall set forth as part of the answer the language deemed to be ambiguous and the interpretation utilized in the response to the Interrogatory.

8. When referring to a person, “identify” means to state the person’s full name, present or last known address, telephone number, present or last known place of employment, and present or last known title at that place of employment. Once a person has been identified in accordance with this paragraph, only the name of the person need be listed in response to subsequent discovery requesting the identification of the person.

## INTERROGATORIES

**Interrogatory No. 1:**

Identify each Person who provided information to answer these Interrogatories.

**Interrogatory No. 2:**

With respect to televisions, as defined in Paragraph 15(b) of the Complaint as “products containing CRTs”, please state with specificity the factual basis (including the identification of each Document, Person or other evidentiary source) for the allegation in Paragraph 1 of the Complaint that Defendants “conspired to fix, raise, maintain and/or stabilize

1 prices" of those "CRT products", namely televisions containing CRTs.

2 **Interrogatory No. 3:**

3 With respect to products other than televisions and monitors, as defined in  
4 Paragraph 15(b) of the Complaint as "products containing CRTs", please state with specificity the  
5 factual basis (including the identification of each Document, Person or other evidentiary source)  
6 for the allegation in Paragraph 1 of the Complaint that Defendants "conspired to fix, raise,  
7 maintain and/or stabilize prices" of those "CRT products", namely products other than televisions  
8 or monitors containing CRTs.

9 **Interrogatory No. 4:**

10 With respect to the allegation in Paragraph 238 of the Complaint that "Defendants  
11 intended to pass on the full cost of" CRTs in their televisions containing CRTs and "in fact did  
12 so", please state with specificity the factual basis (including the identification of each Document,  
13 Person or other evidentiary source) for this allegation.

14 **Interrogatory No. 5:**

15 With respect to the allegation in Paragraph 238 of the Complaint that "Defendants  
16 intended to pass on the full cost of" CRTs in their finished products containing CRTs, other than  
17 televisions and computer monitors, and "in fact did so", please state with specificity the factual  
18 basis (including the identification of each Document, Person or other evidentiary source) for this  
19 allegation.

20 **Interrogatory No. 6:**

21 For each Defendant (regardless of its purported affiliation with any other  
22 Defendant), state with specificity the factual basis (including any Documents, Persons, or other  
23 evidentiary sources) for Your allegations that it conspired, combined, and contracted with any of  
24 the other Defendants "to fix, raise, maintain and/or stabilize the prices of CRT Products sold in  
25 the United States", as alleged in, *inter alia*, Paragraph 1 of the Complaint.

1 Dated: March 8, 2010

By:

  
IAN SIMMONS (*pro hac vice*)

Email: isimmons@omm.com

**O'MELVENY & MYERS LLP**

1625 Eye Street, NW

Washington, D.C. 20006

Telephone: (202) 383-5300

Facsimile: (202) 383-5414

MICHAEL TUBACH(145955)

Email: mtubach@omm.com

**O'MELVENY & MYERS LLP**

Two Embarcadero Center, 28th Floor

San Francisco, California 94111

Telephone: (415) 984-8700

Facsimile: (415) 984-8701

*Attorneys for Defendant Samsung Electronics  
America, Inc.*



1 MICHAEL TUBACH (SBN 145955)  
 2 O'MELVENY & MYERS LLP  
 3 Two Embarcadero Center, 28th Floor  
 4 San Francisco, California 94111  
 5 Telephone: (415) 984-8700  
 6 Facsimile: (415) 984-8701  
 7 Email: mtubach@omm.com

8 IAN SIMMONS (*Admitted Pro Hac Vice*)  
 9 O'MELVENY & MYERS LLP  
 10 1625 Eye St. NW Washington, D.C. 20006  
 11 Telephone: (202) 383-5300  
 12 Facsimile: (202) 383-5414  
 13 Email: isimmons@omm.com

14 Attorneys for Defendant:

15 **SAMSUNG ELECTRONICS AMERICA, INC.**

16 **UNITED STATES DISTRICT COURT**  
 17 **NORTHERN DISTRICT OF CALIFORNIA**

18 IN RE CATHODE RAY TUBE (CRT)  
 19 ANTITRUST LITIGATION

20 No. 07-5944-SC  
 21 MDL No. 1917

22 This Document Relates to:

23 Judge: Hon. Samuel Conti  
 24 Special Master: Hon. Charles A. Legge (Ret.)

25 INDIRECT PURCHASER ACTION

26 **FIRST SET OF DOCUMENT REQUESTS**  
 27 **OF SAMSUNG ELECTRONICS**  
 28 **AMERICA, INC. TO THE INDIRECT**  
**PURCHASER PLAINTIFFS**

29 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Samsung  
 30 Electronics America, Inc. hereby requests that the Indirect Purchaser Plaintiffs ("Plaintiffs") in  
 31 the above-captioned action respond to the following first set of document requests (the  
 32 "Document Requests"). Plaintiffs are directed to serve the requested documents for inspection  
 33 and copying in conformance with the above-cited rules at the offices of O'MELVENY &  
 34 MYERS LLP, Attn: Ian Simmons, 1625 Eye Street NW, Washington, D.C. 20006 (or at such

1 other place as may be agreed upon by the parties), within thirty (30) days after the date of the  
 2 service hereof.

### 3 DEFINITIONS AND INSTRUCTIONS

- 4 1. For the purposes of these Document Requests, the following definitions apply:
- 5 a. "Action" means the above-captioned consolidated class action.
  - 6 b. "And" and "or" shall be construed either disjunctively or conjunctively as  
 7 necessary to bring within the scope of the Document Requests all  
 8 information that might otherwise be construed to be outside of their scope.
  - 9 c. "Complaint" means Plaintiffs' Consolidated Amended Complaint in the  
 10 Action, filed in the United States District Court for the Northern District of  
 11 California on March 16, 2009.
  - 12 d. "CRTs" means cathode ray tubes, as defined in Paragraphs 13 and 14 of  
 13 the Complaint.
  - 14 e. "CRT Products" means "products containing CRTs, such as television sets  
 15 and computer monitors" as defined in Paragraph 15(b) of the Complaint.
  - 16 f. "Defendants" means all entities enumerated in paragraphs 50-108 of the  
 17 Complaint.
  - 18 g. "Document(s)" means "documents" as defined in the Federal Rules of  
 19 Civil Procedure including but not limited to any written, printed, typed,  
 20 recorded, filmed, punched, transcribed, taped or other graphic matter of any  
 21 kind or nature, however produced or reproduced, whether in hard copy,  
 22 electronic, or other form, and includes, without limitation, pamphlets,  
 23 brochures, books, booklets, information sheets, papers, articles, journals,  
 24 magazines, computer printouts, Internet search results, tapes, discs or other  
 25 forms of audio, visual or audio/visual recordings, records, memoranda,  
 26 reports, financial statements, affidavits, handwritten and other notes,  
 27 transcripts, paper, indices, letters, envelopes, telegrams, cables, electronic  
 28 mail messages, telex messages, telecopied messages, telephone messages,

1 summaries or records of telephone conversations, summaries or records of  
2 personal conversations or interviews, summaries or records of meetings or  
3 conferences, minutes or transcriptions or notations of meetings or telephone  
4 conversations or other communications of any type, tabulations, studies,  
5 analyses, evaluations, projections, work papers, statements, summaries,  
6 opinions, journals, desk calendars, product labels, maintenance or service  
7 records, appointment books, diaries, billing records, checks, bank account  
8 statements, invoices.

9 h. "Each" means all, each, and every.

10 i. The use of the term "Interrogatory" refers to those interrogatories in the  
11 First Set of Interrogatories of Defendant Samsung Electronics America,  
12 Inc. to the Indirect Purchaser Plaintiffs, dated March 8, 2010.

13 j. "Person(s)" means and includes all natural persons or entities,  
14 governmental units, partnerships, firms, corporations, associations, joint  
15 ventures, any other form of business organization or arrangement, or any  
16 form of public, private or legal entity.

17 k. "SE Defendants" means Defendants Samsung Electronics America, Inc.  
18 and Samsung Electronics Co., Ltd.

19 l. "You" and "Your" means the Indirect Purchaser Plaintiffs in the Action,  
20 their direct and indirect parents, predecessors in interest, affiliates,  
21 subsidiaries, divisions, predecessors, successors, and assigns, the present  
22 and former officers, directors, employees, attorneys, agents, and  
23 representatives of any of the above, and all persons acting or purporting to  
24 act on their behalf.

25 2. These Document Requests cover each Document and information in Your  
26 possession, custody, or control, including information in the possession of any of Your attorneys,  
27 agents, servants, representatives, consultants, or other persons directly or indirectly employed,  
28

1 retained by, or in privity with You, or anyone else acting on Your behalf or subject to Your  
2 control.

3 3. For each Document requested, produce the entire original Document, along with  
4 each attachment, appendice, enclosure and exhibit, and any copy that is not identical to the  
5 original (whether because of notes made on, or attached to, such copy or otherwise), regardless of  
6 whether you consider the attachments, appendices, enclosures and exhibits to be relevant or  
7 responsive to these requests.

8 4. If any Document is withheld under a claim of privilege or is not produced for  
9 whatever reason, You must:

- 10 a. state with specificity the claim of privilege or other reason used to withhold  
11 the Document from production; and  
12 b. identify each Document by (i) date; (ii) name, occupation, and capacity of  
13 the author; (iii) name, occupation, and capacity of the individual to whom  
14 the allegedly privileged matter emanated; and (iv) subject matter, without  
15 disclosing the Document's contents, in a manner sufficient to allow it to be  
16 described to the Court for a ruling on privilege or other reasons asserted.

17 5. If You object to any portion of the Document Requests, provide all information  
18 called for by that portion of the Document Requests to which You do not object. State with  
19 reasonable particularity the reason for Your objection to the remainder.

20 6. If, in responding to a request, You claim any ambiguity in interpreting either the  
21 Document Requests, or an applicable definition or instruction, such claim shall not be used as a  
22 basis for refusing to respond, but You should set forth as part of Your response the language  
23 deemed to be ambiguous and the interpretation chosen or used in responding to the Document  
24 Requests.

25 7. Each page or sheet produced by You is to be marked with consecutive document  
26 control numbers.

27 8. Identify each Document requested by the Document Requests that has been  
28 destroyed.

**8 Document Request No. 1:**

9 Each Document that supports Your response to Interrogatory No. 2.

11 Each Document that supports Your response to Interrogatory No. 3.

13 Each Document that supports Your response to Interrogatory No. 4.

15 Each Document that supports Your response to Interrogatory No. 5.

17 Each Document that supports Your response to Interrogatory No. 6.


19 Any other Document that supports Your allegations that each of the SE  
20 Defendants conspired to fix, raise, maintain, and/or stabilize the price at which finished products  
21 containing CRTs were sold in the United States.

23 Each document that that supports Your allegations that each of the SE Defendants  
24 intended to pass on the full cost of CRTs in their finished products containing CRTs and in fact  
25 did so.

27 Each document that supports Your allegations that any other Defendant intended  
28 to pass on the full cost of CRTs in their finished products containing CRTs and in fact did so.

1  
2 Dated: March 8, 2010

By:

  
IAN SIMMONS (*pro hac vice*)  
Email: isimmons@omm.com  
**O'MELVENY & MYERS LLP**  
1625 Eye Street, NW  
Washington, D.C. 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414

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4  
5  
6  
7  
8 MICHAEL TUBACH(145955)  
Email: mtubach@omm.com  
9 **O'MELVENY & MYERS LLP**  
Two Embarcadero Center, 28th Floor  
10 San Francisco, California 94111  
Telephone: (415) 984-8700  
11 Facsimile: (415) 984-8701

12  
13 *Attorneys for Defendant Samsung Electronics*  
14 *America, Inc.*